

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

THE AKRON BAIL FUND	)	Case No. 5:23-cv-00837
	)	
Plaintiff	)	JUDGE CHARLES E. FLEMING
	)	
v.	)	MAGISTRATE JUDGE JAMES E.
	)	GRIMES, JR.
CITY OF AKRON	)	
	)	<b>JOINT MOTION TO STAY CASE</b>
Defendant	)	<b>MANAGEMENT SCHEDULE</b>
	)	

Now come Plaintiff The Akron Bail Fund and Defendant City of Akron, by and through counsel, and hereby jointly request a stay of the Case Management Schedule in this case and all deadlines. For cause, the parties state that they believe there is a strong possibility of settlement in this matter based on conversations between counsel and a stay would reserve resources and facilitate settlement negotiations.

The discovery cutoff in this case is imminent at January 31, 2024. The parties, after conducting back to back depositions all week, are about to complete Plaintiff's corporate deposition today and conduct Defendant's corporate deposition Monday. During today's deposition, based upon discovery so far and after conversations between counsel, counsel for both parties believe they will be able to resolve the case. Because of the volume of discovery and some of the complicated issues in the case, evaluating and reaching potential settlement terms will take some time. The parties want to limit any further time investment of their corporate representatives, as well as limit any further fees and travel and

deposition preparation costs incurred, that would result from continuing the depositions. However, if the parties are not able to reach a resolution as they believe they can, they would both be prejudiced if the discovery deadline were to run while they devote the careful attention to a potential settlement that the parties and claims in this case requires. Therefore, a stay of discovery and other deadlines is in furtherance of the settlement to avoid unnecessary fees and costs by completing the corporate depositions of both the Akron Bail Fund and the City of Akron, and would facilitate settlement and prevent prejudice to both parties.

The parties today stopped the deposition, held it open, and called this Court's chambers, which advised the parties to file on the docket a letter explaining this situation and the relief sought. Accordingly, the parties respectfully request that this Court grant a stay of discovery deadlines and other deadlines in this matter to allow the parties to attempt to resolve the matter. In the event that resolution is not possible, the parties would immediately file a motion to resume the same case schedule and complete the outstanding corporate depositions.

Respectfully submitted,

Deborah S. Matz  
Director of Law

/s/ Brian D. Bremer

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On behalf of Plaintiff the Akron Bail Fund

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing was filed electronically on January 26, 2024. Notice of this filing will be sent to all parties by operation of the Clerk of Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Brian D. Bremer